

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Rachel Fingles	:	Chapter 13
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	:	
Debtor	:	Case No.: 17-15549MDC

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**Objection to Proof of Claim of CACH, LLC its Successors and Assigns  
as assignee of Citibank, N.A.**

Debtor through undersigned counsel, Brad J. Sadek, Esquire, objects to proof of claim filed by that CACH, LLC its successors and assigns as assignee of Citibank, N.A., #9, filed on 11/10/2017, (hereto attached and labeled as Exhibit "A") and assigns the following reasons for same:

1. Claimant/Respondent that CACH, LLC its successors and assigns as assignee of Citibank, N.A. Proof of #9, filed on 11/10/2017, as a general unsecured claim in the amount of \$38,883.53: hereto attached and labeled as Exhibit "A" is a copy of the Claim.
2. Debtor did not use or make payments on the debt within four (4) years from the filing date 8/15/2017 of this instant Chapter 13 Bankruptcy.
3. Claimant does not have a right to assert this claim as such claim exceeds the Pennsylvania Statue of Limitations.
4. The Debtor believes the claim account number ends in xxx1220.

WHEREFORE, Debtor respectfully request that this claim be stricken and removed from the Claims Register.

Dated: June 4, 2018

/s/Brad J. Sadek, Esq  
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